

# THE LAW OFFICE OF JEFF CHABROWE

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February 13, 2024

Hon. Hector Gonzalez  
United States District Court  
Eastern District of New York  
225 Cadman Plaza E  
Brooklyn, NY 1201

Re: *USA v. Yiu*, Case No. 23-cr-00089  
Reply to Court Order of Feb. 13, 2024 re Defense Continuance Requests

Dear Judge Gonzalez:

Thank you for the opportunity to clarify defense requests for continuances in the above case. I apologize for any confusion my requests may have engendered.

I am currently in trial before Judge Jane C. Tully in the Kings County Supreme Court in the matter of *People v. Ahmed Morrison*, Case No. IND-71180-20/002. This defendant is incarcerated, and the case has been pending for four years. After unsuccessful plea negotiations, trial on the merits began on January 16, 2024 and has continued every workday since. The trial schedule was extended because law enforcement witnesses for the government had scheduling difficulties. The case should go to the jury tomorrow; extended deliberation is likely. Just prior to this trial, I completed a week-long trial before Judge Block in *United States v. Reynaldo Neseosupe*, Case #: 1:19-cr-00424-FB-1 in the Eastern District of New York.

When I filed my first request for a continuance, I had hoped to be able to schedule Mr. Yiu's plea before I became unavailable. However, the parties have not yet concluded plea negotiations in Mr. Yiu's case and thus that goal became unrealistic. Wanting to ensure Mr. Yiu had the full consideration and attention of his defense counsel in this important change of plea hearing, I asked today for a second continuance until March 4 or thereafter. Immediately after my return, I am closing on a home purchase. On February 28, I have a federal sentencing in *United States v. Ignatov* before Judge Ramos in SDNY Case No. 17CR00630-003 (ER) (a complicated case where sentencing has been pending for several years). I then am due to travel on March 1 to Colombia to see an SDNY client in person. Thus, I thought a date of March 4 or thereafter would accommodate this schedule and allow the parties to fully explore all options in resolving Mr. Yiu's change of plea.

I should have been more careful to explain in full the reasons for what appeared to be identical requests. I hope this explanation adequately addresses the Court's concerns, and that it will be able to grant the continuance request until March 4, 2024 or thereafter. Thank you again for your patience.

Respectfully submitted,



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